Buchanan Ingersoll & Rooney PC

Christopher J. Dalton 973-424-5614 christopher.dalton@bipc.com 550 Broad Street, Suite 810 Newark, New Jersey 07102 T 973-273-9800 F 973-273-9430 www.bipc.com

March 22, 2021

VIA CM/ECF

Hon. Douglas E. Arpert, U.S.M.J. United States District Court For the District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Trenton, New Jersey 08608

Re: Johnson v. Shop-Vac Corp.

Case No. 3:19-cv-14834-BRM-DEA

Text Order for Telephone Status Conference

Dear Judge Arpert:

This firm represents Defendant Shop-Vac Corporation in this matter. I write regarding the Court's text order (DE 28) for a status call on Thursday March 25, 2021 at 10:30 a.m. Unfortunately, I and my co-counsel, Michael Shortnacy of King & Spalding, both have conflicts Thursday. We have conferred with Plaintiff's counsel, Frederick Klorczyk, and all counsel are available on Wednesday March 31, 2021, after 1 p.m. If the Court could reschedule to the call to that afternoon, we can make ourselves available.

Respectfully submitted,

Christopher J. Dalton

Christopher J. Dalton

CJD/

cc: All Counsel (via ECF)